

EXHIBIT 2

DISC-020

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): ALEXANDER HERNAEZ (SBN 201441), LEE SZOR (SBN 276381) FOX ROTHSCHILD LLP 345 California Street, Suite 2200, San Francisco, CA 94104 TELEPHONE NO.: (415) 364-5540 FAX NO. (Optional) (415) 391-4436 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant SpaceX	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central District, Stanley Mosk Courthouse	
SHORT TITLE: Guzman v. SpaceX	
REQUESTS FOR ADMISSION <input checked="" type="checkbox"/> Truth of Facts <input type="checkbox"/> Genuineness of Documents Requesting Party: Defendant SpaceX Answering Party: Plaintiff Gilbert Guzman Set No.: One	CASE NUMBER: BC574495

INSTRUCTIONS

Requests for admission are written requests by a party to an action requiring that any other party to the action either admit or deny, under oath, the truth of certain facts or the genuineness of certain documents. For information on timing, the number of admissions a party may request from any other party, service of requests and responses, restrictions on the style, format, and scope of requests for admission and responses to requests, and other details, see Code of Civil Procedure sections 94–95, 1013, and 2033.010–2033.420 and the case law relating to those sections.

An answering party should consider carefully whether to admit or deny the truth of facts or the genuineness of documents. With limited exceptions, an answering party will not be allowed to change an answer to a request for admission. There may be penalties if an answering party fails to admit the truth of any fact or the genuineness of any document when requested to do so and the requesting party later proves that the fact is true or that the document is genuine. These penalties may include, among other things, payment of the requesting party's attorney's fees incurred in making that proof.

Unless there is an agreement or a court order providing otherwise, the answering party must respond in writing to requests for admission within 30 days after they are served, or within 5 days after service in an unlawful detainer action. There may be significant penalties if an answering party fails to provide a timely written response to each request for admission. These penalties may include, among other things, an order that the facts in issue are deemed true or that the documents in issue are deemed genuine for purposes of the case.

Answers to *Requests for Admission* must be given under oath. The answering party should use the following language at the end of the responses:

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(DATE)

(SIGNATURE)

These instructions are only a summary and are not intended to provide complete information about requests for admission. This *Requests for Admission* form does not change existing law relating to requests for admissions, nor does it affect an answering party's right to assert any privilege or to make any objection.

REQUESTS FOR ADMISSION

You are requested to admit within 30 days after service, or within 5 days after service in an unlawful detainer action, of this *Requests for Admission* that:

- ☒ Each of the following facts is true (if more than one, number each fact consecutively):
☒ Continued on Attachment 1
- ☐ The original of each of the following documents, copies of which are attached, is genuine (if more than one, number each document consecutively):
☐ Continued on Attachment 2

Lee Szor

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY)

Page 1 of 1

ATTACHMENT 1

REQUESTS FOR ADMISSION TO PLAINTIFF, SET ONE

DEFINITIONS

1. The terms “YOU” and “YOUR” mean Plaintiff GILBERT GUZMAN, the Responding Party, and the Responding Party’s present and former agents, and all other such persons acting on the Responding Party’s behalf, including guardians, attorneys, and investigators.
2. The term “COMPLAINT” refers to the Responding Party’s Complaint in this case filed on March 9, 2015.
3. The term “DEFENDANT” refers to SPACEX, the Propounding Party, including its agents, supervisors, managers, partners, and representatives.

REQUESTS FOR ADMISSIONS

REQUEST FOR ADMISSION NO. 1:

Admit that DEFENDANT did not discriminate against YOU on the basis of YOUR alleged disability.

REQUEST FOR ADMISSION NO. 2:

Admit that DEFENDANT did not fail to engage in good faith in the interactive process.

REQUEST FOR ADMISSION NO. 3:

Admit that DEFENDANT did not fail to accommodate YOUR alleged disability.

REQUEST FOR ADMISSION NO. 4:

Admit that DEFENDANT did not discharge YOU in violation of public policy.

REQUEST FOR ADMISSION NO. 5:

Admit that DEFENDANT did not retaliate against YOU because of YOUR disability or because YOU requested reasonable accommodation.

REQUEST FOR ADMISSION NO. 6:

Admit that DEFENDANT did not retaliate against YOU because YOU requested and took protected leave.”

“REQUEST FOR ADMISSION NO. 7:

Admit that DEFENDANT did not discharge YOU because of YOUR alleged disability.

REQUEST FOR ADMISSION NO. 8:

Admit that DEFENDANT did not interfere with YOUR protected leave.

REQUEST FOR ADMISSION NO. 9:

Admit that DEFENDANT did not fail to adhere to its duties to provide Notice in accordance with the regulations governing the California Family Rights Act/Family Medical Leave Act.”

REQUEST FOR ADMISSION NO. 10:

Admit that YOU have not visited or consulted a medical provider regarding the emotional distress, including but not limited to, loss of sleep, anxiety, tension, depression, and humiliation, which YOU allegedly sustained and continue to sustain as alleged in YOUR COMPLAINT.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU have not sustained, and do not continue to sustain, emotional distress, including but not limited to, loss of sleep, anxiety, tension, depression, and humiliation, which YOU allegedly sustained and continue to sustain as alleged in YOUR COMPLAINT.

REQUEST FOR ADMISSION NO. 12:

Admit that YOUR medical leave expired on August 7, 2014.

REQUEST FOR ADMISSION NO. 13:

Admit that YOUR medical leave was not extended until August 22, 2014.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU never notified or informed DEFENDANT that YOUR medical leave was extended until August 22, 2014.

REQUEST FOR ADMISSION NO. 15:

Admit that YOU never provided DEFENDANT with a doctor's note stating that YOUR medical leave was extended until August 22, 2014.

REQUEST FOR ADMISSION NO. 16:

Admit that each time YOU asked DEFENDANT for medical leave, YOU received medical leave.

REQUEST FOR ADMISSION NO. 17:

Admit that you never submitted any written or verbal complaint(s) to DEFENDANT about YOUR contention that DEFENDANT discriminated against YOU on the basis of YOUR alleged disability.

REQUEST FOR ADMISSION NO. 18:

Admit that you are not pursuing a claim under the federal Family Medical Leave Act.

1 ALEXANDER HERNAEZ (SBN: 201441)
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5 Facsimile: 415.391.4436

6 Attorneys for Defendant SPACEX

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

11 GILBERT GUZMAN,

12 Plaintiff,

13 v.

14 SPACE EXPLORATION
15 TECHNOLOGIES CORP., a Delaware
16 corporation; and DOES 1 through 60,
inclusive,

17 Defendants.
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Case No.: BC574495

PROOF OF SERVICE

Complaint Filed: March 9, 2015

PROOF OF SERVICE

I am employed in the County of San Francisco, State of California. I am over the age of 18 years and not a party to this action; my business address is: 345 California Street, Suite 2200, San Francisco, CA 94104.

On the date indicated below, I served the foregoing document(s):

SPACEX'S REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF, GILBERT GUZMAN, SET ONE

SPACEX'S SPECIAL INTERROGATORIES TO PLAINTIFF,
GILBERT GUZMAN, SET ONE

SPACEX'S FORM INTERROGATORIES – GENERAL TO
PLAINTIFF, GILBERT GUZMAN, SET ONE

SPACEX'S FORM INTERROGATORIES – EMPLOYMENT TO
PLAINTIFF, GILBERT GUZMAN, SET ONE

SPACEX'S REQUESTS FOR ADMISSION TO PLAINTIFF,
GILBERT GUZMAN, SET ONE

on the interested party(ies) in this action by placing true copies thereof enclosed in sealed envelope(s) addressed as follows:

Douglas N. Silverstein, Esq.
Michael G. Jacob, Esq.
Kesluk, Silverstein & Jacob, P.C.
9255 Sunset Boulevard, Ste. 411
Los Angeles, CA 90069
T: 310.273.3180
F: 310.273.6137

Attorneys for Plaintiff

☒ **BY FIRST-CLASS MAIL:** I caused said document(s) to be deposited in a facility regularly maintained by the United States Postal Service on the same day, in a sealed envelope, with postage paid, addressed to the above listed person(s) on whom it is being served for collection and mailing on that date following ordinary business practices.

☒ **[STATE]** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed April 30, 2015, at San Francisco, California.


Karen R. Beaton